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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the
Commission's Future Energy Efficiency Policies,
Administration, and Programs.

Rulemaking 06-04-010

**ASSIGNED COMMISSIONER'S RULING ON PROCESS RELATED
TO THE CONSIDERATION OF EMBEDDED ENERGY SAVINGS
RELATED TO WATER EFFICIENCY**

Parties interested in issues related to the energy savings resulting from successful water conservation efforts participated in a workshop held in Downey, California on July 17, 2006. The participants discussed specific policy questions set forth in Attachment 1 to the scoping ruling that I issued in this docket on May 24, 2006. Armed with the results of the workshop, parties filed opening comments by July 31, 2006, and reply comments by August 18, 2006.

Commenting parties agreed that (1) by saving water or developing and treating it more efficiently, it is possible to produce significant energy savings, (2) energy efficiency programs could be more effective if the electric and gas utilities were to promote water efficiency improvements that would provide cost-effective energy savings, and (3) there is a shared sense of urgency to begin accounting for this energy savings potential and incorporating it into the design of the energy efficiency programs.

Parties described two types of energy savings: cold water savings (related to the production, transportation and treatment of water) and hot water savings (those related to reducing the use of energy to heat water). It is the former (sometimes referred to as "upstream" savings) that comprise the embedded

savings opportunity we are addressing in this portion of the proceeding.¹ The commenting parties identify four ways to reduce net energy consumption related to water use by capturing embedded, or “upstream savings.”

1. Conserve water
2. Use less energy-intensive water (gravity-fed or recycling versus groundwater, aqueducts or desalination)
3. Make current delivery and treatment systems more efficient
4. Produce more energy through water delivery and treatment

Although any of these methods would reduce the net consumption of energy related to water use, the first three appear to be most consistent with an energy efficiency strategy.

While it is clear to all participants that the Commission should encourage a strategic integration of water and energy efficiency efforts, there is less certainty as to what changes the utilities can or should incorporate in the current (2006-2008) program cycle. There is a debate as to whether counting embedded energy savings related to water conservation now would produce real new benefits or simply give credit for savings that would have occurred anyway.

Another matter of considerable discussion is that the amount of energy needed to produce, convey, and treat water differs dramatically from place-to-place. For example, the San Francisco waterworks are often considered to be net energy producers because the water is largely conveyed by gravity and the main dam system (Hetch Hetchy) includes hydroelectric generators. By contrast, many communities along the California aqueduct are dependent on pumps to deliver water. Groundwater pumping consumes a lot of energy, while water

¹ We use the term “upstream” loosely, here, since it includes energy use related to post-consumption water treatment, which is clearly a “downstream” activity.

recycling consumes less. Desalination plants are highly energy-intensive because of the need to force water through a series of filters. A further level of complexity relates to the fact that pumped water often moves through more than one energy utility service territory. If a utility near the end-users spends money to reduce water use, some or all of the benefits may accrue to customers in the service territory of an upstream utility.

Most parties encourage the Commission to approve some type of pilot program for implementation during this program cycle to explore the potential for future programs to capture water-related embedded energy savings. In order to improve the likelihood of implementing new programs in the near future, I direct the utilities to submit applications for the approval of pilot programs as described in the ruling, below.

IT IS RULED that:

1. No later than January 15, 2007, Pacific Gas & Electric Company, San Diego Gas and Electric Company, Southern California Edison Company, and Southern California Gas Company shall file applications seeking approval of one-year pilot programs, as described below, to begin July 1, 2007.

2. Each utility should form a partnership with one large water provider to implement a jointly-funded program designed to maximize embedded energy savings per dollar of program cost. I encourage the utilities to work with municipal water utilities to the extent that they appear to be the most promising partners.

3. Funding for these programs would be separate from the funding established for 2006-2008 programs. I encourage the utilities to work together to develop a common program and funding approach, and suggest that they propose limiting the statewide energy utility cost for these pilot programs to approximately \$10 million.

4. While it would be important to count embedded energy savings related to this effort, and to calculate any such savings related to existing programs, the utilities should not seek credit for these savings as part of any rewards or penalties related to the 2006-2008 period. The applications should include proposals for counting the savings for the purpose of understanding program benefits, rather than to affect rewards or penalties.

5. The utilities shall schedule a planning workshop during the second quarter of 2007 to determine what needs to be done to prepare for full incorporation of water-related programs during the 2009-2011 planning period. This workshop should address a methodology to estimate the magnitude of savings along various localities (and review California Energy Commission proxies); evaluation, measurement and verification; procedural guidelines; outreach; and training.

Dated October 16, 2006, at San Francisco, California.

/s/ DIAN M. GRUENEICH

Dian M. Grueneich,
Commissioner

INFORMATION REGARDING SERVICE

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Upon confirmation of this document's acceptance for filing, I will cause a copy of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the copy of the filed document is current as of today's date.

Dated October 16, 2006, at San Francisco, California.

/s/ ERLINDA PULMANO

Erlinda Pulmano

SERVICE LIST

***** APPEARANCES *****

Gerald Lahr
ASSOCIATION OF BAY AREA GOVERNMENTS
101 8TH STREET
OAKLAND CA 94607
(510) 464-7908
jerry1@abag.ca.gov
For: ABAG

Peter Canessa
CALIFORNIA STATE UNIVERSITY, FRESNO
665 ASILO
ARROYO GRANDE CA 93420
(559) 473-0847
pcanessa@charter.net
For: CSUF

Mary Ann Dickinson
Executive Director
CALIFORNIA URBAN WATER CONSERVATION
455 CAPITOL MAIL, SUITE 703
SACRAMENTO CA 95814
(916) 552-5885
maryann@cuwcc.org

Jeanne M. Sole
Deputy City Attorney
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO CA 94102
(415) 554-4619
jeanne.sole@sfgov.org
For: City and County of San Francisco

Tamlyn M. Hunt
Energy Program Director
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2/F
SANTA BARBARA CA 93101
(805) 963-0583 122
thunt@cecmail.org
For: Community Environmental Council

Lynn Haug
GREGG WHEATLAND
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
lmh@eslawfirm.com
For: Dept. of General Services/Energy Policy Advisory
Committee

Robert E. Burt
INSULATION CONTRACTORS ASSN.
4153 NORTHGATE BLVD., NO.6
SACRAMENTO CA 95834
(916) 568-1826
bburt@macnexus.org
For: Insulation Contractors Assn.

Jody London
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
(501) 459-0667
jody_london_consulting@earthlink.net
For: County of Los Angeles, Internal Services
Department

Diana L. Lee
Legal Division
RM. 4300
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-4342
dil@cpuc.ca.gov

Thomas S. Crooks
Director
MCR PERFORMANCE SOLUTIONS
1020 SUNCAST LANE, SUITE 108
EL DORADO HILLS CA 95672
(916) 932-0113
tcrooks@mcr-group.com
For: MCR Performance Solutions

Don Meek
Attorney At Law
10949 SW 4TH AVENUE
PORTLAND OR 97219
For: Women's Energy Matters

Cynthia K. Mitchell
530 COLGATE COURT
RENO NV 89503
(775) 324-5300
ckmitchell1@sbcglobal.net
For: TURN

Audrey Chang
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO CA 94104
(415) 875-6100
achang@nrdc.org
For: Natural Resources Defense Council (NRDC)

Chonda J. Nwamu
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO CA 94120-7442
(415) 973-6650
cjn3@pge.com
For: Pacific Gas and Electric

Gail L. Slocum
PACIFIC GAS AND ELECTRIC COMPANY
ROOM 3151
77 BEALE STREET
SAN FRANCISCO CA 94120
For: Pacific Gas and Electric Company

J. Andrew Hoerner
REDEFINING PROGRESS
1904 FRANKLIN STREET
OAKLAND CA 94612
(510) 507-4820
hoerner@redefiningprogress.org
For: Redefining Progress

Matt Brost
RLW ANALYTICS, INC
1055 BROADWAY, SUITE G
SONOMA CA 95476
(707) 939-8823 X 13
matt.brost@rlw.com

Carlos F. Pena
Attorney At Law
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET
SAN DIEGO CA 92101
(619) 696-4320
cfpena@sempra.com
For: San Diego Gas & Electric/SoCal Gas

Irene M. Stillings
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO CA 92123
(858) 244-1192
irene.stillings@sdenergy.org
For: San Diego Regional Energy Office

Richard Esteves
SESCO, INC.
77 YACHT CLUB DRIVE
LAKE HOPATCONG NJ 07849
(973) 663-5125
sesco@optonline.net
For: SESCO

Hank Ryan
SMALL BUSINESS CALIFORNIA
325 30TH AVENUE
SANTA CRUZ CA 95062
(510) 459-9683
hryan2003@yahoo.com
For: Small Business California

Michele Swanson
SOUTH BAY CITIES COUNCIL OF GOVERNMENTS
3868 CARSON STREET, SUITE 110
TORRANCE CA 90503
(310) 543-3022
michele@sbesc.com
For: South Bay Energy Savings Center

Larry R. Cope
MIKE MONTOYA
Attorney At Law
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-2570
copelr@sce.com
For: Southern California Edison

Steven D. Patrick
Attorney At Law
SOUTHERN CALIFORNIA GAS/SDG&E
555 WEST 5TH STREET, SUITE 1400
LOS ANGELES CA 90013
(213) 244-2954
spatrick@sempra.com
For: Southern California Gas/SDG&E

Michael Boccadoro
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO CA 95814
(916) 441-4383
mboccadoro@dolphingroup.org
For: Inland Empire Utilities, Chino Basin Coalition,
Santa Ana Watershed Project Authority

Diana Mahmud
THE METROPOLITAN WATER DISTRICT
700 N. ALAMEDA STREET
LOS ANGELES CA 90012
(213) 217-6985
dmahmud@mwadh2o.com
For: The Metropolitan Water District of Southern
California

Hayley Goodson
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876
hayley@turn.org
For: TURN

Marcel Hawiger
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876
marcel@turn.org
For: TURN

Robert C. Wilkinson
Director, Water Policy Program
4426 BREN BUILDING
SANTA BARBARA CA 93106
wilkinson@es.ucsb.edu

Barbara George
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX CA 94978
(510) 915-6215
bgwem@igc.org
For: Women's Energy Matters (WEM)

***** STATE EMPLOYEE *****

Nilgun Atamturk
Executive Division
RM. 5303
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-4953
nil@cpuc.ca.gov

Gary Klein
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO CA 95814
(916) 653-8555
gklein@energy.state.ca.us

Michael Messenger
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO CA 95814
(916) 654-4774
Mmesseng@energy.state.ca.us

Nancy Jenkins, P.E.
Manager
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-43
SACRAMENTO CA 95814

Sylvia Bender
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS22
SACRAMENTO CA 95814
(916) 653-6841
sbender@energy.state.ca.us

Jeanne Clinton
Executive Division
RM. 4102
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1159
cln@cpuc.ca.gov

Cheryl Cox
Division of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3027
cxc@cpuc.ca.gov
For: DRA

Fred L. Curry
Water Division
RM. 3106
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1739
flc@cpuc.ca.gov

Tim G. Drew
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-5618
zap@cpuc.ca.gov

Meg Gottstein
Administrative Law Judge
PO BOX 210/21496 NATIONAL STREET
VOLCANO CA 95689
(209) 296-4979
gottstein@volcano.net

Nora Y. Gatchalian
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2421
nyg@cpuc.ca.gov

Meg Gottstein
Administrative Law Judge Division
RM. 2106
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-4802
meg@cpuc.ca.gov

Edward Howard
Division of Strategic Planning
RM. 5110
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1114
trh@cpuc.ca.gov

Judith Ikle
Energy Division
RM. 4012
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1486
jci@cpuc.ca.gov

Peter Lai
Energy Division
RM. 500
320 WEST 4TH STREET SUITE 500
Los Angeles CA 90013
(213) 576-7087
ppl@cpuc.ca.gov

Ariana Merlino
Energy Division
1350 FRONT ST., STATE BLDG. ROOM 4006
San Diego CA 92101
(619) 525-4220
ru4@cpuc.ca.gov

Don Schultz
Division of Ratepayer Advocates
RM. SCTO
770 L STREET, SUITE 1050
Sacramento CA 95814
(916) 327-2409
dks@cpuc.ca.gov
For: DRA

Joyce Steingass
Division of Ratepayer Advocates
RM. 3200
505 VAN NESS AVE
San Francisco CA 94102
(415) 355-5532
jws@cpuc.ca.gov

George S. Tagnipes
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2451
jst@cpuc.ca.gov

Christine S. Tam
Division of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 355-5556
tam@cpuc.ca.gov
For: DRA

Zenaida G. Tapawan-Conway
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2624
ztc@cpuc.ca.gov

Christopher R Villarreal
Division of Strategic Planning
RM. 5119
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1566
crv@cpuc.ca.gov

Steven A. Weissman
Administrative Law Judge Division
RM. 5107
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2195
saw@cpuc.ca.gov

Sean Wilson
Water Division
AREA 3-C
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1818

***** INFORMATION ONLY *****

John Laun
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO CA 92106
(619) 840-4804
jlaun@apogee.net

Bruce McLaughlin
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO CA 95814
(916) 326-5812
mclaughlin@braunlegal.com

Peter C. Jacobs
BUILDING METRICS INC.
2540 FRONTIER AVE. SUITE 100
BOULDER CO 80301
(303) 444-4289
pjacobs@buildingmetrics.biz

Janet Whittick
BUSINESS ENERGY COALITION
MC B8R, PGE
PO BOX 770000
SAN FRANCISCO CA 94177-0001
(415) 973-5445
jewz@pge.com

Tom Eckhart
CAL - UCONS, INC.
10612 NE 46TH STREET
KIRKLAND WA 98033
(425) 576-5409
tom@ucons.com

Ed Osann
Executive Director
CALIF. URBAN WATER CONSERVATION COUNCIL
1001 CONNECTICUT AVE., NW. SUITE 801
WASHINGTON DC 20036
(202) 429-8873
eosann@starpower.net

Bill Kelly
Correspondent
CALIFORNIA ENERGY CIRCUIT
PO BOX 1022
SOUTH PASADENA CA 91031
(626) 441-2112
southlandreports@earthlink.net

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO CA 94110
CEM@newsdata.com

John Celona
505 VISTA AVENUE
SAN CARLOS CA 94070
(650) 802-9201
jcelona@sbcglobal.net

Michael Cheng
2723 HARLAND COURT
WALNUT CREEK CA 94598
(925) 947-2188
michael.cheng@paconsulting.com

Ann Kelly
Department Of The Environment
CITY AND COUNTY OF SAN FRANCISCO
11 GROVE STREET
SAN FRANCISCO CA 94102
(415) 355-3720
ann.kelly@sfgov.org

Nora Hernandez
COUNTY OF LOS ANGELES-INTERNAL SERVICES
1100 N. EASTERN AVENUE
LOS ANGELES CA 90063
(323) 881-3949
nhernandez@isd.co.la.ca.us

Jennifer Porter
Policy Analyst
DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY SUITE 110
SAN DIEGO CA 92123
(858) 244-1180
jennifer.porter@sdenergy.org

Gene Thomas
ECOLOGY ACTION
211 RIVER STREET
SANTA CRUZ CA 95060
(831) 426-5925
gthomas@ecoact.org

Mahlon Aldridge
ECOLOGY ACTION, INC.
PO BOX 1188
SANTA CRUZ CA 95061
(831) 426-5925 X 116
emahlon@ecoact.org

Ted Flanigan
ECOMOTION - THE POWER OF THE INCREMENT
1537 BARRANCA PARKWAY, SUITE F-104
IRVINE CA 92618
(949) 450-7155
TFlanigan@EcoMotion.us

Walter Mcguire
EFFICIENCY PARTNERSHIP
2962 FILLMORE STREET
SAN FRANCISCO CA 94123
(415) 775-7571
wmcguire@fypower.org

Shaun Ellis
2183 UNION STREET
SAN FRANCISCO CA 94123
(415) 771-7571 317
sellis@fypower.org

Norman J. Furuta
FEDERAL EXECUTIVE AGENCIES
333 MARKET STREET, 10TH FLOOR, MS 1021A
SAN FRANCISCO CA 94105-2195
(415) 977-8808
norman.furuta@navy.mil

Thomas P. Conlon
President
GEOPRAXIS
PO BOX 5
SONOMA CA 95476-0005
(707) 280-1529
tconlon@geopraxis.com

Dave Gordon
Program Manager
SAN DIEGO REGIONAL ENERGY OFFICE
8510 TECH WAY, SUITE 110
SAN DIEGO CA 92123-1450
david.gordon@sdenergy.org

Dr. Hugh (Gil) Peach
H GIL PEACH & ASSOCIATES LLC
16232 NW OAKHILLS DRIVE
BEAVERTON OR 97006
(503) 645-0716
hgilpeach@scanamerica.net

Douglas E. Mahone
HESCHONG MAHONE GROUP
11626 FAIR OAKS BLVD., 302
FAIR OAKS CA 95628

Jennifer Holmes
ITRON INC.
11236 EL CAMINO REAL
SAN DIEGO CA 92130
(831) 457-9822
jennifer.holmes@itron.com

Alex Kang
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND CA 94607
(510) 844-2896
alex.kang@itron.com

John Cavalli
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND CA 94607
(510) 844-2876
john.cavalli@itron.com

Rachel Harcharik
ITRON, INC.
11236 EL CAMINO REAL
SAN DIEGO CA 92130
(858) 724-2638
rachel.harcharik@itron.com

Bob Ramirez
ITRON, INC. (CONSULTING & ANALYSIS DIV.)
11236 EL CAMINO REAL
SAN DIEGO CA 92130
(858) 724-2650
bob.ramirez@itron.com

Jeff Hirsch
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO CA 93012-9243
(805) 553-9000
Jeff.Hirsch@DOE2.com

Katie Shulte Joung
455 CAPITOL MALL, SUITE 703
SACRAMENTO CA 95814
(916) 552-5885
katie@cuwcc.org

Kurt J. Kammerer
K. J. KAMMERER & ASSOCIATES
PO BOX 60738
SAN DIEGO CA 92166-8738
(619) 546-6175

R.06-04-010 DGX/eap

(916) 962-7001
dmahone@h-m-g.com

kjk@kjkammerer.com

Edward Vine
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90-4000
BERKELEY CA 94720
(510) 486-6047
elvine@lbl.gov

Terry M. Fry
NEXANT, INC.
101 SECOND STREET, 10TH FLOOR
SAN FRANCISCO CA 94105
(415) 369-1021
tmfry@nexant.com

Richard Mccann
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS CA 95616
(530) 757-6363
rmccann@umich.edu

Frank Diaz
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
(415) 973-1713
fdd3@pge.com

Peter Miller
Consultant
1834 DELAWARE STREET
BERKELEY CA 94703
(510) 847-5161
p.miller@earthlink.net

James Turnure
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
(415) 973-4948

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND CA 94612
(510) 834-1999
mrw@mrwassoc.com

Jay Luboff
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO CA 94177
(415) 973-5241
J1Ly@pge.com

Devra Wang
SHERYL CARTER, PETER MILLER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO CA 94104
(415) 875-6100
dwang@nrdc.org

Jennifer Barnes
PACIFIC GAS AND ELECTRIC COMPANY
MAIL STOP N6G
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-2797
j5b2@pge.com

Eric Wanless
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO CA 95104
(415) 875-6100
ewanless@nrdc.org

Josephine Wu
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
(415) 973-3414
jwwd@pge.com

Laurie Park
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA CA 95670-6078
(916) 631-3200
lpark@navigantconsulting.com

William C. Miller
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-4911
wcm2@pge.com

Kenny Swain
POWER ECONOMICS

Carl Pechman
POWER ECONOMICS
901 CENTER STREET

R.06-04-010 DGX/eap

901 CENTER STREET
SANTA CRUZ CA 95060
(813) 427-9990
kswain@powereconomics.com

SANTA CRUZ CA 95060
cpechman@powereconomics.com

Brian Hedman
Vice President
QUANTEC, LLC
720 SW WASHINGTON STREET, STE 400
PORTLAND OR 97205
(503) 228-2992
brian.hedman@quantecllc.com

Joy C. Yamagata
Regulatory Manager
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT
SAN DIEGO CA 92123
(858) 654-1755
jyamagata@semprautilities.com

Eileen Parker
QUEST
2001 ADDISON STREET, STE. 300
BERKELEY CA 94704
(510) 540-7200
eparker@qcworld.com

Central Files
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP31E
SAN DIEGO CA 92123
(858) 654-1240
centralfiles@semprautilities.com

Shilpa Ramalya
77 BEALE STREET, ROOM 981
SAN FRANCISCO CA 94105
(415) 973-3186
srrd@pge.com

Michael Baker
Vice President
SBW CONSULTING, INC.
2820 NORTHUP WAY, SUITE 230
BELLEVUE WA 98004
(425) 827-0330
mbaker@sbwconsulting.com

Lauren Casentini
RESOURCE SOLUTIONS GROUP, INC.
711 MAIN STREET
HALF MOON BAY CA 94019
(650) 726-5113
lcasentini@rsgrp.com

Don Arambula
SOUTHERN CALIFORNIA EDISON
2131 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-8179
don.arambula@sce.com

Robert Kasman
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA CA 95476
(707) 939-8823 X 32
robert.kasman@rlw.com

Marian V. Brown
SOUTHERN CALIFORNIA EDISON
PO BOX 800
2131 WALNUT GROVE AVE., 3RD FLOOR B7
ROSEMEAD CA 91711
(626) 302-8281
marian.brown@sce.com

Stacia Okura
RLW ANALYTICS, INC.
1055 BROADWAY, SUITE G
SONOMA CA 95476
(707) 939-8823 X 17
stacia.okura@rlw.com

Case Administration
SOUTHERN CALIFORNIA EDISON COMPANY
ROOM 370
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-4875
case.admin@sce.com

Robert Mowris, P.E.
ROBERT MOWRIS & ASSOCIATES
PO BOX 2141
OLYMPIC VALLEY CA 96145
(530) 583-1570
rmowris@earthlink.net

Tory S. Weber
SOUTHERN CALIFORNIA EDISON COMPANY
2131 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-8186

Nikhil Gandhi
STRATEGIC ENERGY TECHNOLOGIES, INC.

R.06-04-010 DGX/eap

17 WILLIS HOLDEN DRIVE
ACTON MA 01720
(978) 264-0511
gandhi.nikhil@verizon.net

Patricia Thompson
SUMMIT BLUE CONSULTING
3333 VINCENT RD STE 210
PLEASANT HILL CA 94523-4326
(925) 935-0270
pthompson@summitblue.com

Melissa Mcguire
SUMMIT BLUE CONSULTING LLC
1722 14TH STREET, SUITE 230
BOULDER CO 80302
(720) 564-1130
mmcguire@summitblue.com

Dan Geis
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO CA 95814
(916) 447-6206
dgeis@dolphingroup.org

tory.weber@sce.com

Cheryl Collart
VENTURA COUNTY REGIONAL ENERGY ALLIANCE
1000 SOUTH HILL ROAD, STE. 230
VENTURA CA 93003
(805) 289-3335
cheryl.collart@ventura.org
Grey Staples
THE MENDOTA GROUP, LLC
1830 FARO LANE
SAINT PAUL MN 55118
(651) 204-0458
gstaples@mendotagroup.net

Timothya. Blair
THE METROPOLITAN WATER DISTRICT
700 N. ALAMEDA STREET
LOS ANGELES CA 90012
tblair@mw dh2o.com

William P. McDonnell
THE METROPOLITAN WATER DISTRICT
700 N. ALAMEDA STREET
LOS ANGELES CA 90012
bmcdonnell@mw dh2o.com

Craig Tyler
TYLER & ASSOCIATES
2760 SHASTA ROAD
BERKELEY CA 94708
(510) 841-8038
craigtyler@comcast.net

(END OF SERVICE LIST)